

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN**

Visteon Corporation,

Plaintiff,

v.

No.: 4:16-cv-11180-TGB-EAS

Timothy D. Leuliette,

Hon. Terrence G. Berg

Defendant.

_____ /

**DECLARATION OF SEAN B. CROTTY IN SUPPORT OF
DEFENDANT'S MOTION FOR ENTRY OF JUDGMENT
CONFIRMING ARBITRATION AWARD**

1. I am a partner with the law firm Crotty & Schiltz, LLC, counsel for Defendant Timothy D. Leuliette in the above-captioned matter. As an attorney admitted to practice before this court, and one of the attorneys appearing for Defendant in this matter, I respectfully submit this declaration to provide the Court with true and accurate copies of documents that are referenced in Defendant's Motion for Entry of Judgment Confirming Arbitration Award.

2. Attached as Exhibit 1 is a true and accurate copy of the September 30, 2012 Employment Agreement between Visteon Corporation and Timothy D. Leuliette containing the arbitration agreement between the respective parties.

3. Attached as Exhibit 2 is a true and accurate copy of the Notice of Appointment of Martin C. Weisman, Esq. as arbitrator.

4. Attached as Exhibit 3, which is being filed with the Court under seal, is a true and accurate copy of the Arbitration Award dated October 31, 2017.

I declare under penalty of perjury that the foregoing is true and correct.

Executed: November 27, 2017

/s/ Sean B. Crotty
Sean B. Crotty.